

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

8/14/08

GLOBAL DETECTION AND
REPORTING, INC.,

Plaintiff,

-against-

SECURETEC DETEKTIONS-
SYSTEME AG, SECURETEC
CONTRABAND DETECTION AND
IDENTIFICATION, INC., and
TEAMOPS, LLC.

Defendants.

X
Civil Action No.: 08-CIV-5441 (GEL/FM)

**JOINT PROPOSED CIVIL
CASE MANAGEMENT PLAN**

Plaintiff Global Detection and Reporting, Inc. ("Plaintiff") and Defendants Securetec Detektions-Systeme AG and Securetec Contraband Detection and Identification, Inc., through their counsel, hereby submit their proposed civil case management plan pursuant to Judge Lynch's August 4, 2008 Order and Fed. R. Civ. P. 26(f).

1. The Plaintiff demands a trial by jury.
2. **JOINDER OF PARTIES:** Any application to join any person as a party to this action shall be made on or before January 31, 2009.
3. **AMENDMENT OF PLEADINGS:** Any application to amend the pleadings to this action shall be made on or before November 28, 2008.
4. **DISCOVERY:** All discovery in this action shall be completed on or before March 31, 2009. The parties agree to exchange Rule 26 disclosures *by all parties except Team Ops* on or before September 11, 2008; *initial disclosures by Team Ops to be due by September 30, 2008.* *Di*

A. **Request for Production of Documents:** The parties shall exchange First Requests for Production of Documents on or before September 30, 2008.

B. **Interrogatories:** Interrogatories pursuant to Local Rule 33.3(a) of the Civil Rules of the Southern District of New York shall be served on or before September 30, 2008.

C. **Depositions:** Depositions to be completed on or before February 27, 2009.

D. **Expert Discovery.**

i. **Plaintiff.** Plaintiff to designate expert witnesses, if any, on or before November 14, 2008.

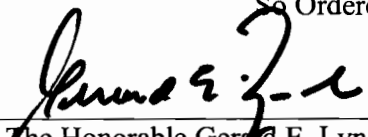
ii. **Defendants.** Defendants to designate expert witnesses, if any, on or before December 15, 2008.

E. **Requests to Admit.** The parties shall exchange Requests to Admit on or before February 27, 2009.

5. *Next Conference : April 3, 2009, at 10:00 a.m. J.L.*

Dated: August 14, 2008

So Ordered:


The Honorable Gerard E. Lynch,